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Attorneys for the Qui Tam Plaintiff,
Other Counsel listed in signature page

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STATE OF CALIFORNIA, ex rel. VEN-A-CARE OF THE FLORIDA KEYS, INC., a
Florida Corporation,

Plaintiffs,

 \mathbf{v}_i

ABBOTT LABORATORIES, INC.; AMGEN, INC.; ARMOUR PHARMACEUTICAL CO.; AVENTIS BEHRING, L.L.C.; AVENTIS PHARMACEUTICALS, INC.; B. BRAUN MEDICAL, INC.; B. BRAUN OF AMERICA, INC.; BAXTER HEALTHCARE CORP.; BEDFORD LABORATORIES; BEN VENUE LABORATORIES, INC.; BOEHRINGER

MDL No. 1456
Master File No. 01-12257-PBS

(Original Central District of California
No. 03-CV-2238)

Judge Patti B. Saris

NOTICE OF MOTION FOR LEAVE
TO FILE UNREDACTED EXHIBITS
TO FIRST AMENDED COMPLAINT
IN INTERVENTION UNDER SEAL

INGELHEIM CORP.; BOEHRINGER
INGELHEIM PHARMACEUTICALS INC.;
BRISTOL-MYERS SQUIBB COMPANY
a/k/a BRISTOL-MYERS ONCOLOGY
DIVISION/HIV PRODUCTS; C.H.
BOEHRINGER SOHN
GRUNDSTUCKSVERWALTUNG GMBH &
CO. KG; DEY, INC.; DEY, L.P.; EMD, INC.;
GENEVA PHARMACEUTICALS INC.;
GENSIA INC.; GEN SIA SICOR, INC.;
GLAXO WELLCOME INC. f/k/a
BURROUGHS WELLCOME CO.;
GLAXOSMITHKLINE PLC; HOECHST
MARION ROUSSEL, INC.; IMMUNEX
CORP.; LIPHA, S.A.; McGAW, INC.;
MERCK KGaA; MYLAN LABORATORIES,
INC.; MYLAN PHARMACEUTICALS,
INC.; NOVARTIS AG; PHARMA
INVESTMENT, LTD.; ROXANE
LABORATORIES, INC.; SANDOZ, INC.;
SCHERING-PLOUGH CORP.; SICOR, INC.
f/k/a GEN SIA PHARMACEUTICALS, INC.;
SMITHKLINE BEECHAM CORPORATION
d/b/a GLAXOSMITHKLINE; TEVA
PHARMACEUTICAL INDUSTRIES, LTD.;
WARRICK PHARMACEUTICALS CORP.;
Z.L.B. BEHRING,

Defendants.

To: All Counsel of Record,

Please take notice that on August 25, 2005, we are submitting to the Clerk of the District Court of Massachusetts, under seal, unredacted Exhibits A through K and Exhibits M through R to the Plaintiffs' First Amended Complaint in Intervention, filed August 24, 2005 (August 25, Boston time), pending a decision by the Court in response to Plaintiffs' Motion For Leave To File Unredacted Exhibits Under Seal (Motion). The Motion is being filed on August 25, 2005, accompanied by a proposed order.

Dated: August 25, 2005

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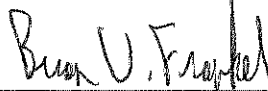
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Ven-A-Care of the Florida Keys, Inc.,



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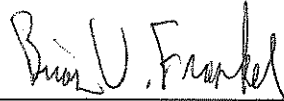
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CERTIFICATE OF SERVICE

I, BRIAN V. FRANKEL, hereby certify that on August 25, 2005, I caused a true and correct copy of the foregoing, **NOTICE OF MOTION FOR LEAVE TO FILE UNREDACTED EXHIBITS TO FIRST AMENDED COMPLAINT IN INTERVENTION UNDER SEAL**, to be served on all counsel of record via electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending a copy to Verilaw Technologies for posting and notification to all parties.

Dated: August 25, 2005



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